

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE DIVISION**

GBB DRINK LAB, INC.,

CASE NO.: 23-CV-60800-AHS

Plaintiff,

v.

FSD BIOSCIENCES, INC. and  
FSD PHARMA, INC.,

Defendants.

and

FSD PHARMA, INC.,

Third-Party Plaintiff/Counterclaim Plaintiff

v.

GBB DRINK LAB, INC., and JOSEPH ROMANO  
Third-Party Defendants/Counter Defendants

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**GBB’S UNOPPOSED EXPEDITED MOTION FOR EXTENSION OF TIME**

Pursuant to Local Rule 7.1(d), Plaintiff GBB Drink Lab, Inc. (“GBB”) hereby moves without opposition from Defendants FSD Biosciences, Inc. and FSD Pharma, Inc.’s (“FSD”) on an expedited basis to extend the briefing deadlines to file oppositions and replies to the summary judgment motions and statements of material facts filed by both GBB [Dkt. Nos. 116, 117, and 125] and FSD [Dkt. Nos. 129 and 130] on July 21, 2025, and the *Daubert* motions filed by FSD on July 21, 2025 [Dkt. Nos. 127 and 128], and in support thereof states as follows:

1. On July 21, 2025, GBB filed: GBB’s Motion for Partial Summary Judgment [Dkt. No. 116] and Statement of Material Facts [Dkt. No. 117]; and GBB’s Notice of Joinder to Joseph

Romano's Motion for Final Summary Judgment on FSD's Third-Party Complaint and GBB's Motion for Final Summary Judgment on FSD's Counterclaim [Dkt. No. 125].

2. On July 21, 2025, FSD filed: FSD's *Daubert* Motion to Exclude the Opinions and Testimony of Plaintiff's Expert, Mark E. Gauthier [Dkt. No. 127]; FSD's *Daubert* Motion to Exclude the Opinions and Testimony of Plaintiff's Expert, Edward G. Brown [Dkt. No. 128]; and FSD's Motion for Summary Judgment [Dkt. No. 130] and Statement of Material Facts [Dkt. No. 129].
3. Pursuant to Local Rule 7.1(c)(1), FSD and GBB are currently required to file Responses to the aforementioned motions for summary judgment and *Daubert* motions on or before August 4, 2025, and all Replies are currently due on or before August 11, 2025.
4. Based on the volume of briefings submitted and the complexity of the arguments presented therein, there is good cause for a short extension to allow FSD and GBB additional time to address the Response and Reply deadlines.
5. GBB therefore requests this Court grant a one-week extension of the briefing schedule, requiring FSD and GBB to file all Responses to the aforementioned motions for summary judgment and *Daubert* motions on or before August 11, 2025, and requiring FSD and GBB to file all Replies to the aforementioned motions on or before August 18, 2025.
6. The relief sought herein only applies to Dkt. Nos. 116, 117, 125, 127, 128, 129, and 130.
7. No other deadlines in the current scheduling order will be affected by this request.
8. The expedited treatment pursuant to Local Rule 7.1(d) is requested due to the close-approaching deadlines.
9. Consistent with Local Rule 7.1(a)(3), the parties have conferred, via email, on the relief requested herein.

10. Third-Party Defendant Joseph Romano (“Romano”) takes no position as to the relief requested in this Motion, as the aforementioned filings [Dkt. Nos. 116, 117, 125, 127, 128, 129, and 130], do not involve or require a response from Romano.

11. FSD does not oppose the relief requested herein to extend the briefing schedule for replies and responses to the aforementioned filings [Dkt. Nos. 116, 117, 125, 127, 128, 129, and 130], but as a caveat to its position, FSD also believes that that the Court should extend the deadline to respond to all summary judgment motions, *inclusive of* Romano’s July 21, 2025, Motion for Summary Judgment [Dkt. No. 122] and Statement of Material Facts [Dkt. No. 123] (collectively, “Romano Motion”), and *Daubert* motions to August 11, 2025, as FSD believes this would be more efficient than having staggered deadlines for responding to the motions filed on July 21, 2025.

12. Romano objects to moving FSD’s deadline to respond to the Romano Motion to August 11, 2025, due to Counsel’s previously scheduled court obligations, including a scheduled trial that would be implicated by an extended briefing schedule concerning the Romano Motion.

13. GBB takes no position as to any extension relating to the Romano Motion and believes such a possible extension, which is not a part of the relief sought herein, is best addressed through additional motion practice under separate cover by and between FSD and Romano.

**WHEREFORE**, for the foregoing reasons, GBB respectfully request this Court enter an order granting a short extension to the briefing schedule for Dkt. Nos. 116, 117, 125, 127, 128, 129, and 130 only, requiring FSD and GBB to file all Responses to the aforementioned motions on or before August 11, 2025, and requiring FSD and GBB to file all Replies on or before August

18, 2025. This request, as it relates to Dkt. Nos. 116, 117, 125, 127, 128, 129, and 130, is unopposed by FSD.

Dated: July 29, 2025.

Respectfully submitted,

By: /s/ Meagan C. Nicholson  
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**CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 7.1**

Prior to filing this Motion, the undersigned conferred with all parties in a good faith effort to resolve the issues raised herein, and the parties' positions on this Motion are outlined in detail in the body of this Motion.

Dated: July 29, 2025

By: /s/ Meagan C. Nicholson  
MEAGAN C. NICHOLSON

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this **29th** day of July 2025, a copy of the foregoing document was served via email to all attorneys of record.

By: /s/ Meagan C. Nicholson  
MEAGAN C. NICHOLSON